

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

Horizon Global Americas Inc.,)	Case No. 1:20-cv-00310-PAB
)	
Plaintiff,)	Judge Pamela A. Barker
)	
v.)	
)	
Northern Stamping, Inc.,)	
)	
Defendant.)	

**Horizon Global Americas Inc.’s Motion to Dismiss
Horizon’s First Amended Complaint with Prejudice**

Pursuant to the Court’s order of February 5, 2025 (“Order”) and Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiff Horizon Global Americas Inc. (“Horizon”) complies with the Order by moving this Court to dismiss with prejudice its entire First Amended Complaint (Dkt 16) for infringement of United States Patent Nos 9,834,050 and 10,589,585 (“Asserted Patents”) against Defendant/Counterclaimant Northern Stamping, Inc. (“NSI”). This dismissal would dispose of all of Horizon’s claims in this case and dismiss Horizon’s entire cause of action.

In addition to voluntarily dismissing its claims with prejudice, Horizon is granting NSI an express covenant not to sue, filed herewith, on any claims of the Asserted Patents.

A proposed Order is attached to this Motion.

Dated: February 19, 2023

Respectfully submitted,

/s/Brendan E. Clark

Christina J. Moser (074817)
Email: cmoser@bakerlaw.com
Brendan E. Clark (085634)
Email: bclark@bakerlaw.com
Brian A. Troyer (059671)

Email: btroyer@bakerlaw.com

BAKER & HOSTETLER LLP

Key Tower

127 Public Square, Suite 2000

Cleveland, OH 44114-1214

Telephone: 216.621.0200

Facsimile: 216.696.0740

*Attorneys for Plaintiff, Horizon Global
Americas, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on this 19th day of February 2025 via the Court's electronic filing system on all parties registered to receive service therefrom.

By: Brendan E. Clark
Brendan E. Clark